

- Page 3-11: Does the 97th ARCOM motor pool have a parcel number? The EBS should address the wash racks at this motor pool. Have investigations been conducted and where do the wash racks discharge?
- Page 3-11: Does the 275th Supply motor pool have a parcel number? It is difficult to identify the location of Building 504 in the Southeast Cantonment Area.
- Page 3-11: The DOL storage yard/motor pool/maintenance facility should have a parcel designation. How are the routine activities managed at this area? Are solvents captured? How is the discharge from the wash racks treated? Additional information is needed about the activities at this location.
- Page 3-14: The text should identify the parcel number of the hazardous waste storage area.
- Page 3-16: Where are the potable wells located? The locations should be identified in the text and on the maps.
- Page 3-18: The septic tanks identified by building number should also have more location identification provided.
- Page 4-4: Table 5-1a indicates the asphalt pit is parcel 20. Table 4-1 indicates the asphalt pit is parcel 2. Please clarify.
- Page 4-4: Table 4-1 identifies the Fire Training parcel as 306. If the soil and groundwater are contaminated with lead this site needs additional investigation. The site description should include information on the contaminant levels if remediation is not needed. Based on the information provided the parcel number may need to be modified.
- Page 4-9: The text lists three locations of PCB storage but does not indicate parcel numbers. Are parcel designations associated with locations? Is Building 4432 the same as TT3432?
- Table 4-1: What is the size of the parcel identified as Station 1? One location indicates 0.25 acres and another indicates 7.4 acres. Is building 400 found at Parcel 68?
- Table 4-1: This table provides a different description for parcel 29 than is found in Table 5-1a and a different building number. Please clarify the parcel and building number.
- Table 4-1: The description for the PX service station is different in Table 4-1 and 5-1a as indicated for parcel 248.
- Table 4-1: A transformer leak is noted at Parcel 317. Is this



parcel identified in Table 5-1a?

Table 4-1: This table refers to BRAC Parcels 307,308, 310, 309, 311, 312, 313, 302, and 303 but these parcels are not included in Table 5-1a. Please clarify.

The "Installation Assessment of the U.S. Army Garrison, Fort Pickett, 1982" indicated lead and paint in the soil near Building 126. Is Building 126 identified in Figure 5-4? Should a parcel number be assigned to this site?

Table 4-1 Station #5: Building 1800 is identified as located at Parcel 130. Table 5-1a indicates that Building 1800 is located at Parcel 157. Please clarify.

Table 4-1 Station #6: The table indicates Building 2870 is located a parcel 205. Table 5-1a indicates Building 2870 is located at Parcel 233. Please clarify.

Table 4-1 Station #8: The table indicates Building 1558 is located at Parcel 277. Table 5-1a indicates that building is located on Parcel 280. Please clarify.

Table 4-1: Table 5-1a indicates that the fire training area is located at parcel 103.

Table 4-1: Transformer 002 is located at parcel 131 according to Table 5-1a.

Table 4-1: Transformer 005 is located at parcel 148 according to Table 5-1a.

Table 4-1: Transformer 191 is located at parcel 296 according to Table 5-1a.

Table 4-1: Building 1082 is located at Parcel 116 according to Table 5-1a.

Table 4-1: Building 136 is located at parcel 28 according to Table 5-1a.

Table 4-1: The former asphalt pit was located at Parcel 20 according to Table 5-1a.

Table 4-1: Building 1556 is indicated to be located at Parcels 268 and 269. Table 5-1a indicates this building is located at parcel 282. Please clarify.

Table 4-1: Buildings 134 and 143 are located in parcels 26 and 32 respectively according to Table 5-1a.



Table 4-1: Building 1543 is located in parcel 284 according to Table 5-1a.

Table 4-1: Is the 1500 area located in parcel 271 or parcel 277?

Tables 4-4, 4-5, 4-6: Additional information could be provided in each of these tables which would allow the identification of the location of specific buildings, such as map coordinates or parcel numbers.

Table 5-1a: Parcel 42 The Installation Assessment conducted in 1982 indicated that a rinse water holding tank was located in this area. Based on the activities at Buildings 240 and 232 it is suggested that this area be included in the sampling and analysis program.

Additional information concerning the drainage from this location, whether to storm sewer or sanitary sewer, should be provided. Is Hurricane Branch potentially impacted? The Installation Assessment states that herbicides were mixed in the parking lot outside Building 240. The needs to be addressed as well as the soakage pit referenced in the Installation Assessment.

Table 5-1a: Parcel 48 Since pesticides and herbicides were stored at this location, more details should be provided concerning other activities such as mixing. This site should be included in the sampling and analysis plan.

Table 5-1a: Parcel 55 This site should be assessed. Activities described in Table 5-1a as well as in the Installation Assessment indicate the need for sampling activity at this location.

Table 5-1a: Sampling at Parcel 80 should confirm that a release has not occurred.

Table 5-1a: What was the activity at Parcel 111 related to pesticides and herbicides? Based on the description of the activity sampling may be necessary.

Table 5-1a: The level of PCB contamination at parcel 116 indicates the need for additional sampling to confirm the degree of contamination.

Table 5-1a: Parcel 227 Page 2-1 of the EBS mentions a spill at Building 564. Table 4-1 identifies this building in parcel 227 with a floor drain. Table 5-1a does not mention this spill either in the description or in the Parcel designation. Please clarify.

Table 5-1a: Parcel 230 Table 4-1 indicates heavily stained soil under a waste oil tank. This site should be addressed in the sampling and analysis plan.



Table 5-1a: Parcel 240 is indicated in Figure 5-12 but is not addressed in this table.

Table 5-1a: Parcel 268 in Table 4-1 indicates a discharge to an outside drainage ditch. Are surface waters or groundwater impacted? What are the contaminants? Additional information is needed on this site.

Table 5-1a: Parcel 269 in Table 4-1 indicates the oil water separator overflowed to a grassy ditch. Are surface waters or groundwater impacted? Table 4-1 also indicated cracks in the concrete pad, staining and possible contamination from oil and grease and solvents. This site appears to be a candidate for sampling and analysis.

Table 5-1a: It is suggested that Parcel 10 be further investigated.

Table 5-1a: Sampling at Parcel 12 and Parcel 13 are warranted.

Table 5-1b: The table provides location coordinates however the first 27 pages of table 5-1b have the same coordinates, 19, 24. Correct coordinates should be assigned.

Table 5-1b: This table would be more usable if the BRAC Parcel Labels indicated if the parcel was excessed or realigned.

Table 5-1b: It appears that some of the parcels (transformer locations) on pages 7 of 48 and 8 of 48 should be identified as the Southeast Cantonment Area rather than the Northwest Cantonment Area.

Table 5-1b: It appears that some of the parcels (transformer locations) on pages 26 of 48 and 27 of 48 should be identified as the Northwest Cantonment Area rather than the Southeast Cantonment Area.

Table 5-1b: Pages 46 to 48 of Table 5-1b list several parcels with unknown locations. These locations should be determined and indicated in the final EBS report.



ORIGINAL (Red)

## COMMONWEALTH of VIRGINIA

### DEPARTMENT OF ENVIRONMENTAL QUALITY

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Thomas L. Hopkins Director

(804) 698-4000 1-800-592-5482

July 16, 1996

William L. O'Dell Director of Public Works Fort Pickett Blackstone, Virginia 23824

Dear Mr. O'Dell:

Thank you for providing the Department of Environmental Quality (DEQ), Office of Federal Facilities Restoration and Superfund, the opportunity to comment on the "CERFA Letter Report for Fort Pickett, Virginia" (CERFA Report). On April 26, 1996, this Office received the CERFA Report requesting our review and concurrence with the designated CERFA Category 1 and CERFA qualified parcels. On June 18, 1996, this Office received a letter from Mr. David Foley requesting concurrence on the proposed Category 1 parcels and qualified parcels and requesting comments on Category 2-7 parcels. Mr. Foley's letter indicated that for purposes of review only the approximately 4000 acres excess property should be considered. On June 13, 1996, as part of a discussion of the Environmental Baseline Survey (EBS) report, a hand drawn delineation of the excess area was indicated on Figure 5-1 and Figures 5-3 through 5-14 of the EBS.

Without conducting independent studies and based completely on the documentation provided in the "Environmental Baseline Survey Report, Fort Pickett, April 1996," the DEQ concurs with the Category 1 designations for the excessed areas of Parcel 2 (Agricultural Research Area), Parcel 3 (Operations Area), Parcel 5 (Northwest Cantonment Area), Parcel 7 (West Close-in Training Area) and Parcel 8 (Southeast Cantonment Area). This concurrence is being provided with the exception of the comments which are attached. Category 2-7 parcels within any Category 1 parcel are not being reviewed for concurrence, however, comments are provided.

ORIGINAL (Red)

Mr. William L. O'Dell Fort Pickett CERFA Report Page 2

The DEQ concurs with the qualified parcels designation as indicated in the CERFA Report. This concurrence is based upon review of the EBS report without independent studies. In the EBS report, certain parcels are indicated as potentially contaminated due to lead based paint, asbestos containing material, radon, radiological sources, and the presence of transformers. Fort Pickett has undertaken or is planning surveys for each of these contaminants to determine the extent of contamination. The results of these surveys will enable Fort Pickett to identify contamination and conduct the necessary remediation prior to transferring the property. This concurrence is also contingent upon the appropriate remediation being conducted as necessitated by future use.

If you have any questions concerning these comments, please contact Durwood Willis of my staff at (804) 698-4192.

Sincerely,

Hassan Vakili, Director

Division of Waste Operations

cc: Erica S. Dameron, DEQ

David K. Paylor, DEQ

Mike Taurino, EPA Region III 3HW50

#### Comments on the CERFA Report Category 1 Designations



Category 1 Parcel 5 (excessed Northwest Cantonment Area): Table 4-5 of the EBS report indicates that transformer 178 located near Parcel 79 (within the excessed Northwest Cantonment Area) has leaked. The boundary and description of Parcel 79 should be expanded to include transformer 178.

Category 1 Parcel 5 (excessed Northwest Cantonment Area): Table 4-5 of the EBS report indicates that transformer 182 has leaked. It is suggested that a parcel designation be established for this location.

Category 1 Parcel 8 (excessed Southeast Cantonment Area): Table 4-5 indicates that transformer 219 has leaked. It is suggested that a parcel designation be established for this location.

Category 1 Parcel 8 (excessed Southeast Cantonment Area): Table 4-5 indicates that transformer 215 has leaked. The boundary and description of Parcel 122 should be expanded to include transformer 215.

#### Comments on the CERFA Report Categories 2-7 Designations

Parcel 2 Agricultural Research Area:
Within the Agricultural Research Area, there are several proposed
Category 2 and 3 parcels which warrant comments. Parcel 10:
Table 5-1a of the CERFA Report indicates a spill of PCBs at
Parcel 10. Approximately 20 gallons of PCBs were spilled at this
location, with follow-up sampling indicating soil concentrations
less than 1 ppm of PCBs. Due to the quantity of PCBs spilled and
the persistence of these compounds, it is suggested that this
site be further evaluated to confirm the noted low level of PCBs.

Parcel 98: The CERFA Report should indicate the extent of investigations performed during the tank removals at Parcel 98 and identify any contamination detected and concentrations detected.

Parcel 103: The CERFA Report recommends no further action at Parcel 103, the fire training area. The preliminary assessment site investigation identified lead in the soil and groundwater. Although an adequate database may exist, the information presented does not support Category 3. Further evaluation of the existing data may be necessary to assign the appropriate category or collection of additional data.

Parcel 5 Northwest Cantonment:
Parcel 80: Due to the activity at Parcel 80 and Building 493
(storage of transformers and storage of PCBs), additional detail
concerning the condition of the site may be needed to confirm the
proposed category or to assign a different category. Additional
discussion or evaluation of Parcel 80 and Building 493 is
suggested.

ORIGINAL (Red)

Mr. William L. O'Dell Fort Pickett Comments Page 2

Parcel 7 West Close-in Training Area: Concerning Parcel 114, Building 1073 has been used to store transformers or PCBs and related activities. This parcel should be further assessed.

Parcel 8 Southeast Cantonment Area: Parcel 116, near Building 1082, is the location of a spill of PCBs with concentrations from 6 ppm to 23 ppm detected. It is suggested that this parcel be further investigated.





# COMMONWEALTH of VIRGINIA

#### DEPARTMENT OF ENVIRONMENTAL QUALITY

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July 31, 1996

Thomas L. Hopkins Director

(804) 698-4000 1-800-592-5482

Mr. David L. Foley
Base Environmental Coordinator
Directorate of Public Works
Fort Pickett
Blackstone, Virginia 23824

Dear Mr. Foley:

Thank you for providing the Department of Environmental Quality, Office of Federal Facilities Restoration and Superfund, the opportunity to comment on the "Finding of Suitability to Lease (FOSL) Interim Lease Buildings 405, 410, 450, and Quartermaster Circle East, Fort Pickett".

The staff's comments concerning the FOSL are attached. If you have questions concerning these comments please contact me at (804) 698-4192.

Sincerely,

Durwood H. Willis

Office of Federal Facilities Restoration and Superfund

cc: Erica S. Dameron, DEQ David K. Paylor, DEQ

Michael Taurino, EPA Region III (3HW50)



Activities related to asbestos containing material should be consistent with the criteria found in paragraph 2.b. of the scope of work for asbestos removal and comply with the requirements of the Virginia Department of Labor and Industry and the National Emissions Standards for Hazardous Air Pollutants.

Page 3 Section 5.4 Lead-Based Paint (LBP) Buildings 405, 410, and 450 were constructed prior to 1968. Title X of the Residential Lead Based Paint Hazard Reduction Act of 1992 serves as guidance for LBP on Army properties. For housing constructed prior to 1960, Title X requires an inspection to identify LBP and LBP hazards. Inspections are conducted surface by surface to identify the location of hazards. Surveys include sampling inside and outside the buildings based on the LBP survey. LBP hazards are corrected prior to residential use.

According to DoD guidance the Army is required to insure that properties whether leased or sold are free of immediate LBP hazards prior to residential habitation.

Page 3 Section 5.5 Radon The EBS indicates that (Table 4-6) Buildings 405, 410, and 450 have not been evaluated for radon. Tests were conducted at 255 buildings with positive results (>4.0 pico curies per liter) in three buildings. These levels were confirmed in two of the three buildings.

The Army Radon Reduction Program indicates that for Priority 1 structures (schools, living areas) radon levels greater than four pico curies per liter would trigger long term monitoring. As noted above radon sampling has not been conducted for the above structures.

ORIGINAL (Red)

Comments on the "Finding of Suitability to Lease (FOSL) Interim Lease Buildings 405, 410, 450 and Quartermaster Circle East, Fort Pickett"

- Page 1. Section 1.2 Purpose As stated in this section, the FOSL is based on the "Draft Basewide Environmental Survey (EBS)". The comments on the Draft EBS have not been addressed and the assigned categories of those parcels are subject to change.
- Page 2. Section 5.1 Hazardous Substances This section indicates that a hazardous waste notification is not required. Attachment 2 indicates that notification is required.
- Page 2. Section 5.2 Underground and Above Ground Storage Tanks (USTs and ASTs). Associated with Building 410 is a 1000 gallon UST. The "Information Compiled from the Draft Basewide Environmental Baseline Survey for the Proposed Lease of Buildings 405, 410, 450 and Quartermaster Circle East, Fort Pickett" indicates this UST remains in place. However, analytical data has not been provided to confirm there has not been a releases.

The FOSL indicates the Lessee will be restricted from conducting subsurface ground disturbing activity. The FOSL does not indicate any restriction on the use of the tank.

Fort Pickett has an active program for UST removals. If the UST at Building 410 is scheduled for removal prior to September 1997, the FOSL could provide that information.

Fort Pickett has developed the "Scope of Work Investigate Abandoned Gasoline Pipeline Fort Pickett". It appears that the pipeline may cross the edge of the Quartermaster Circle East and parking areas. The FOSL does not indicate the presence of this gasoline pipeline and or note the potential investigation and/or cleanup by the Army as well as any restriction on subsurface ground disturbing activity.

Page 2 Section 5.3 Asbestos-Containing Material (ACM) ACM has been confirmed in Building 405 by previous testing. The Army has adopted the following asbestos exposure standard for non-occupational exposure (i.e. office areas) for air borne asbestos: 0.01 fibers per cubic centimeter. Army guidance specifies that documentation should be provided to the transferee which includes information on the type, location, and condition of ACM in any facility. The FOSL does not identify potential uses such as insulation for pipes, ducts, and boilers, surface material sprayed or applied for sound deadening purposes, or miscellaneous uses such as ceiling tiles, floor tiles, roofing material, mastic for glue, fire proofing textiles, and wall board. The FOSL does not indicate the condition of the material particularly if it is in poor condition and shows signs of peeling, cracking, or crumbling.

The FOSL does not note the upcoming asbestos survey which includes Buildings 405, 410, and 450 or the management of ACM.





# COMMONWEALTH of VIRGINIA

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September 10, 1996

Thomas L. Hopkins Director

(804) 698-4000 1-800-592-5482

Mr. David L. Foley
Base Environmental Coordinator
Directorate of Public Works
Fort Pickett
Blackstone, Virginia 23824

Dear Mr. Foley:

Thank you for providing the Department of Environmental Quality, Office of Federal Facilities Restoration and Superfund, the opportunity to comment on the "Finding of Suitability to Lease (FOSL) Interim Lease Buildings 405, 410, 450, and Quartermaster Circle East, Fort Pickett".

Although it does not appear that State and/or Federal regulations require the Department of the Army to obtain the State's concurrence with a FOSL, the State embraces the DoD policy that notification of the intent to lease property is an invitation for the State to express its views on the property's suitability for lease. On July 31, 1996 the DEQ provided comments to your office on this proposed lease for the referenced buildings and areas. Responses were provided to DEQ comments by Mr. Francis Gilmore on August 13, 1996. The DEQ appreciates the opportunity to discuss the responses with Fort Pickett and all comments concerning the FOSL have been addressed.

If you have any questions please contact me at (804) 698-4192.

Sincerely,

Durwood H. Willis Office of Federal

Facilities Restoration

and Superfund

cc: Erica S. Dameron, DEQ

David K. Paylor, DEQ

Michael Taurino, EPA Region III (3HW50)





### COMMONWEALTH of VIRGINIA

#### DEPARTMENT OF ENVIRONMENTAL QUALITY

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Thomas L. Hopkins Director

(804) 698-4000 1-800-592-5482

August 5, 1997

David L. Foley Base Environmental Coordinator Directorate of Public Works Fort Pickett Blackstone, Virginia 23824

Dear Mr. Foley:

Thank you for providing the Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration and Superfund, the opportunity to review the "Draft Site Screening Protocol Fort Pickett July 2, 1997." The purpose of this site screening protocol is to determine which sites qualify for no further action with respect to further investigations and the ones which should stay in the process for additional evaluation. The site screening protocol, as provided, appears adequate for the initial stage of the investigation (i.e., the preliminary assessment/site investigation (PA/SI) stage). At the PA/SI stage, the decisions are based on which only include readily-obtainable information analytical data. At some sites, however, it may be determined that limited (focused) sampling may be more appropriate. The proposed protocol addresses this need. At this point in the process, it is suggested that the screening protocol provide the opportunity for the project managers to come to some determination on the status of the sites. If the project managers unanimously agree that the site(s) is not a concern, then, the site(s) will be dropped from the process. If there is concern about the site(s), then, the site(s) will be elevated to a site-screening area.

The VDEQ supports the use of a pre-RI/FS screening process to evaluate site screening areas. Attachment 1 identifies the data needed for evaluating each site. Documentation of the pre-remedial toxicological evaluation (attachment 2), which is one step in the pre-RI/FS process, has been previously provided to Fort Pickett and Roy R. Weston. Comments provided February 14, 1997, to Fort Pickett on the "Preliminary Assessment Investigation Scope of Work Fort Pickett" indicated that the Pre-remedial Toxicological Evaluation Process should be applied at the screening phase. Those comments also indicated that, during the screening process, samples

From:

MICHAEL TAURINO

To:

In:"dhwillis@deq.state.va.us"

Subject:

Weston's Screening Risk Management Plan

Durwood - I'm in the process of reviewing the report. Something that jumps out at me is the number of sites Weston has identified in Zone 1. They come up with seven. This number does not seem accurate to me. Can you confirm? I'd rather go with what you think since you have walk-over most, if not all, of Zone 1.

From: MICHAEL TAURINO
To: OKORN-BARBARA
Subject: Fort Pickett

Barbara - As I already indicated to you, I'm the RPM for this BRAC site. Just like BARC, I've asked the contractor (Weston) to put together a Site Screening risk management plan. Could you take a look at the plan and see if it meets BTAG standards? Unlike the plan for BARC, this plan does not include protocol for the baseline risk assessment. It just includes site screening and specifically the comparison to appropriate benchmarks (you know... the first step of the process). It does not get into what is described in chapters 1 and 2 of the eco guidance (assessment endpoints..etc). Perhaps another contractor will be doing this later work. If you can fit the review in your schedule, please let me know and I'll put a couple of copies in your "in box" and let you know the accounting information. Thank you.

From: MICHAEL TAURINO

To: In:"francis.h.gilmore@nao02.usace.army.mil"
Subject: Weston's Risk Management Plan for Fort Pickett

Francis - Yesterday afternoon I received comments from EPA's ecological staff concerning the subject document. The report is adequate and the comments were minor (however, some revision is necessary). I spoke to my contractor and she indicated that her comments would be forthcoming next week. Once I receive her comments, I will then compile them all and send them to you and Dave Kang late next week. If there is a need to get comments sooner, please let me know.

CC: In: "bkang@cenadl.nad.usace.army.mil"

From: MICHAEL TAURINO To: OKORN-BARBARA

Subject: Fort Pickett Site Screening Protocol

Barbara - Thank you for the BTAG review. I just wanted to get back to you and respond to specific comments in your memo.

Regarding areas where they should be providing site specific information such as investigative zones and local ecology, this information will be collected in a separate document and submitted together with the results of the site screening process (BTAG screen). Any supporting information used during the screening will be based on information they compile in this separate report which we are calling a PA/SI (pre-remedial). FYI, the excess property (area of study) will be broken into three investigative zones. Three PA/SI reports will be compiled for each investigative zone.

Regarding areas where they are using "a certain amount of subjectivity" to interpret analytical results, I will recommend that they refrain from doing this. The impression I received from your memo is that when performing the "BTAG screen", a sample is either above or below the appropriate screening level. Interpretation by the inclusion of statistical methods should not be included in the assessment.

I have already provided the contractor with a copy of the guidance. Contaminants of Concern (COCs) identified as a result of completing the "BTAG screen" will undergo the procedures identified in the manual, including the compilation of assessment endpoints and NOAEL values.

Finally, since you and your group did not object on the recommended benchmarks I'm assuming they are acceptable. Moreover, in a recent conference call Weston indicated that the most conservative benchmark will be used for screening purposes.

I don't think we have to meet to go over your comments. If this message captures the spirit of your memo, we are good to go! If there is something that I missed or inaccurately interpreted, please let me know.



From: MICHAEL TAURINO
To: OKORN-BARBARA
Subject: Fort Pickett

Barbara - Before the word came down that BRAC is to take a priority in tech support, I sent a copy of the Weston "Site Screening Protocol (SSP)" to Gannett Fleming (GF) for their review. I've received their comments this morning. In their letter they make a few eco points which may have an impact on the SSP. I just want to run these points by you to make sure the comments are appropriate before I send them to Fort Pickett.

- (1) They indicate that EPA's <u>ECO Update</u>, <u>ECO Tox Thresholds (Jan. 1996)</u> should be used when selecting eco benchmarks. Evidently, a criteria for the selection process is identified for when more than one benchmark could apply.
- (2) They recommend that EPA's <u>Proposed Sediment Quality Criteria (1993)</u> be included in the eco benchmark list.
- (3) They recommend that the SSP should reference and use <u>Incidence of Adverse Biological Effects within Ranges of Chemical Concentrations in Marine and Estuarine Sediment</u>, Environmental Management.

I just want to make sure that they are using the appropriate benchmarks when they do the initial screen.

Regarding BARC, in light of the priority switch in tech support would you prefer that I use GF to support my oversight needs with you serving a secondary role? Or would you still want to take the lead role for eco issues at this site?

I'm bringing this up because I have a RI Work Plan scheduled to be submitted next week for the Biodegradable LF. You saw this site during your visit at BARC.

Michael



From: BARBARA OKORN

To: TAURINO-MICHAEL, jeff

Date: 8/14/97 3:36pm Subject: Fort Pickett -Reply

we screen against NOAA ERLs and ERMs, reg 3 btag screening levels.

we do NOT support the ecotox thresholds. In fact all 10 regional btags are against them and they came out of HQ after the btags refused to support them. The method is not appropriate for superfund eras. we only use them if we are desparate and can't find any other number. same for the sed qual criteria-not for SF ERAs.

I'm not familiar with the 3rd, so i wouldn't recommend it- Jeff are you?

In general they should use what i mentioned above and follow the 1197 ert era guidance. I'll be back on wednesday if you have any questions

>>> MICHAEL TAURINO 08/14/97 01:29pm >>> Barbara - Before the word came down that BRAC is to take a priority in tech support, I sent a copy of the Weston "Site Screening Protocol (SSP)" to Gannett Fleming (GF) for their review. I've received their comments this morning. In their letter they make a few eco points which may have an impact on the SSP. I just want to run these points by you to make sure the comments are appropriate before I send them to Fort Pickett.

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I just want to make sure that they are using the appropriate benchmarks when they do the initial screen.

Regarding BARC, in light of the priority switch in tech support would you prefer that I use GF to support my oversight needs with you serving a secondary role? Or would you still want to take the lead role for eco issues at this site?

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Michael